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June 13, 2025

Honorable Jessica G. L. Clarke
500 Pearl St.
New York, NY 10007-1312

RE: Cowle v. U.S. Department of Education; 7:24-cv-08111-JGLC.

Dear Judge Clarke:

Our office represents Plaintiff in the above-captioned matter. With the consent of all parties, I write to provide a status update as directed by the Court. ECF Dkt. No. 21.

In this action, Plaintiff seeks to have her student loan debt forgiven based on, inter alia, alleged fraud perpetrated by the college she attended. At the onset of this case, the parties exchanged pertinent documents with one another without the use of formal discovery tools. Initially, the parties had hoped to settle this matter without undergoing depositions or utilizing formal discovery tools. A magistrate order was also briefly in place, but no settlement was proposed by Defendant. Hence, settlement discussions were not fruitful and the parties were forced to pivot their approach.

After realizing the need for supplemental discovery, Plaintiff's counsel sent Defendant's counsel formal discovery demands, including a notice of deposition, on or about May 19, 2025. As of the date of this letter, Defendant's counsel has not formally responded to Plaintiff's demands nor has provided demands of their own. However, Defendant's counsel has recently indicated that it is now Defendant's intention to depose Plaintiff. Defendant's counsel also indicated that the responses to Plaintiff's discovery requests will be served on June 25, 2025. The parties are now in active discussions with one another regarding the scheduling, means, and manner of conducting depositions.

The parties continue to engage in discussions about ways to resolve this case. In light of the additional time needed to complete depositions, the parties respectfully request 60 days to complete any additional discovery, and respectfully propose thereafter submitting a letter to the Court requesting a post-discovery status conference. This is the parties' second request for an extension to finish discovery.

Respectfully,

/s/ Rick S. Cowle
Rick S. Cowle, Esq.